

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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THE GENERAL HOSPITAL  
CORPORATION and  
DANA-FARBER CANCER  
INSTITUTE, INC.,

Plaintiffs,

v.

ESOTERIX GENETIC  
LABORATORIES, LLC and  
LABORATORY CORPORATION  
OF AMERICA HOLDINGS,

Defendants.

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C.A. No. 1:18-cv-11360-IT

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

The plaintiffs The General Hospital Corporation and Dana-Farber Cancer Institute, Inc. and the defendants Esoterix Genetic Laboratories, LLC and Laboratory Corporation of America Holdings (collectively, the “Parties”) hereby jointly move that the Court enter the Stipulated Protective Order attached hereto as Exhibit 1.

The Parties anticipate exchanging in discovery in this action, but wish to limit disclosure of, information and documents that constitute or contain confidential or proprietary information of the Parties. The attached proposed Protective Order does not attempt to alter the Parties’ obligations under the Local Rules to seek impoundment or leave to file under seal any confidential information. The Parties have agreed that pending approval by the Court, the Stipulated Protective Order shall govern the conduct of the Parties and any Confidential Information, as defined therein, produced by any party in advance of entry by the Court shall be subject to its terms.

WHEREFORE, as good cause exists, the Parties jointly request the following:

- (1) that the Court adopt and sign the accompanying Stipulated Protective Order; and
- (2) that the accompanying Stipulated Protective Order be entered on the docket.

Respectfully submitted,

Plaintiffs,  
THE GENERAL HOSPITAL  
CORPORATION and  
DANA-FARBER CANCER  
INSTITUTE, INC.  
By their attorneys,

Defendants,  
ESOTERIX GENETIC LABORATORIES,  
LLC and LABORATORY CORPORATION  
OF AMERICA HOLDINGS,

By their attorneys,

/s/ Carolyn A. Marcotte  
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Dated: August 16, 2018

**CERTIFICATE OF SERVICE**

I, Carolyn A. Marcotte, certify that on August 16, 2018, this Joint Motion filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to the non-registered participants.

/s/ Carolyn A. Marcotte

Carolyn A. Marcotte